

**U.S. Department of the Interior  
Bureau of Land Management  
Kremmling Field Office  
P O Box 68  
Kremmling, CO 80459**

## **DETERMINATION OF NEPA ADEQUACY (DNA)**

NUMBER: DOI-BLM-LLCON02000-2014-052-DNA

PROJECT NAME: Smith Mesa

LEGAL DESCRIPTION:

Grand County, Colorado, 6th PM;

T. 1 N., R. 78 W., Sec. 04, 05;

T. 2 N., R. 78 W., Sec. 20, 21, 28, 29, 32, 33.

APPLICANT: BLM

ISSUES AND CONCERNS:

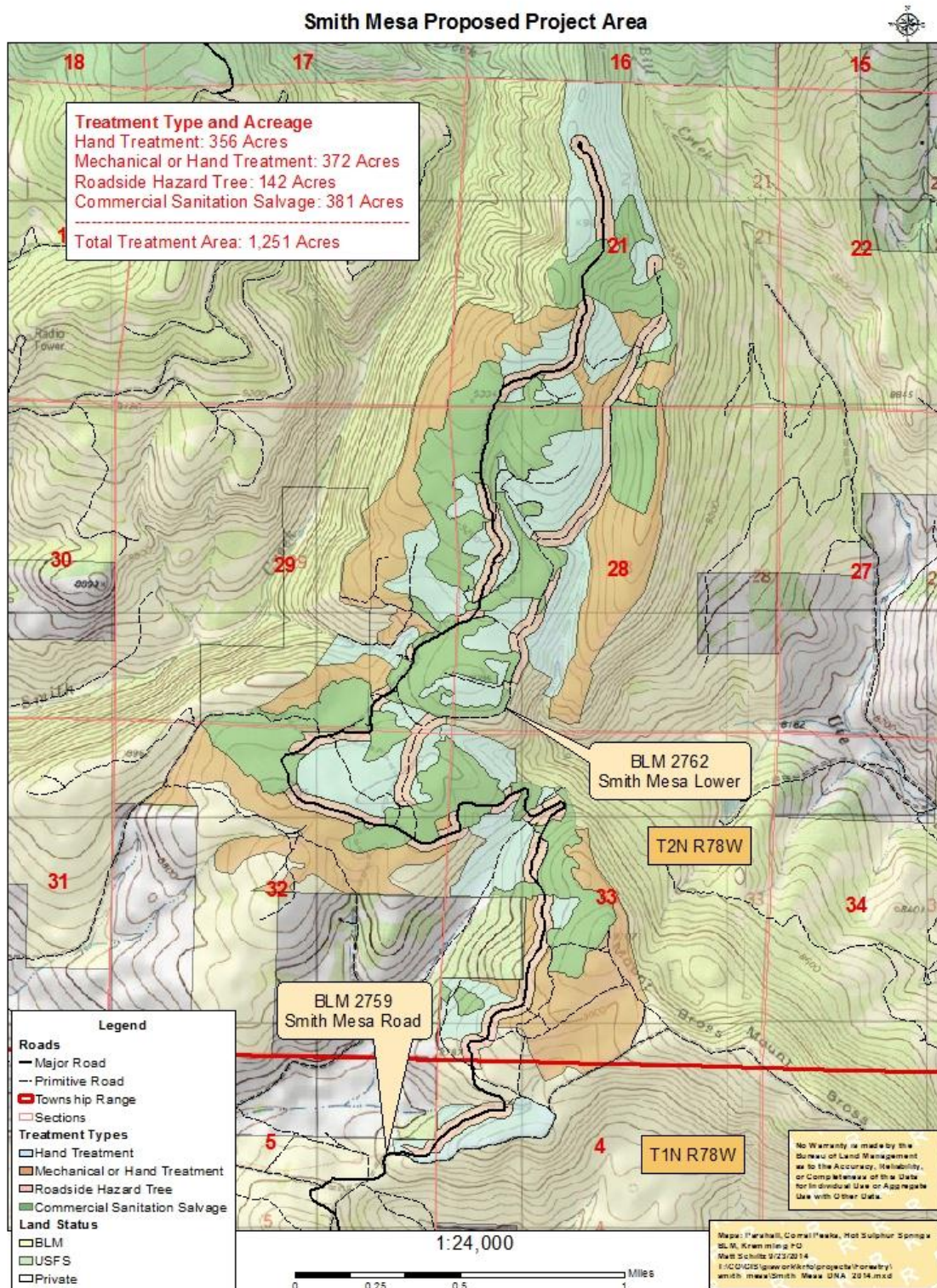
All issues and concerns can be found in the Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA which is hereby incorporated by reference.

DESCRIPTION OF PROPOSED ACTION:

The Proposed Action is comprised of three main activities (Project Maps in Attachments). All acreage is approximate and based on best available data.

1. Corridor clearing of dead, disease infested, and prone to windthrow hazard trees within 125 feet of BLM Roads 2759 and 2762 totaling 142 acres. Clearing and piling will be done by machinery and/or hand.
2. Mechanical vegetative treatments that would include:
  - a. 381 acres of commercial sanitation timber sales.
  - b. 728 acres would be cut, with 372 acres cut by hand to reduce damage to immature trees. The remaining 356 acres would be cut by machine or by hand. Slash would be lopped and scattered, except where it would result in too high of fuel loading. In these areas, the slash would be piled. Piles would be placed at least thirty feet from live trees.
3. Burning of mechanical and hand slash piles.

All design features from the Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA would be followed.



Decision to be Made:

The BLM will decide whether or not to authorize the implementation of the Proposed Action, and if so, under what terms and conditions.

PLAN CONFORMANCE REVIEW:

The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Name of Plan: Kremmling Resource Management Plan (RMP), Record of Decision (ROD)

Date Approved: December 19, 1984; Updated February 1999

Decision Number/Page: Decision 6, Pages 9 and 10, sections b. and c.

Decision Language: “The planned actions will emphasize improving forest vigor and growth as well as minimizing losses caused by insects, disease, or fire.” “Intensive management activities could include timber harvesting techniques, artificial regeneration, stand conversion, stand improvement, pre-commercial thinning, and commercial thinning. Limited management activities will involve primarily custodial practices such as fire protection and salvage.”

The RMP designates the lands for this action as having a forest products land use priority in Township 2 North. These priority areas are committed to the growth and harvesting of commercial forest products through intensive management. The lands within Township 1 North are within a livestock land use priority. Timber management is considered a compatible use in livestock priority areas, and both intensive and limited management actions are allowed.

REVIEW OF EXISTING NEPA DOCUMENTS:

List by name and date all existing NEPA documents that cover the Proposed Action.

Name of Document: Grand County Hazard Tree Removal  
Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA

Date Approved: 5/12/14

Name of Document: Grand County Hazard Tree Removal Biological Assessment

Date Approved: 4/11/14

NEPA ADEQUACY CRITERIA:

1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document? If there are differences, can you explain why they are not substantial?

*This Proposed Action is a feature of the Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA. The Proposed Action is within the same analysis area of the Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA.*

2. Is the range of alternatives analyzed in the existing NEPA document appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?

*Three alternatives (Proposed Action, No Action Alternative, and one Alternative) were analyzed in Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA. No reasons were identified to analyze additional alternatives and these alternatives are considered to be adequate and valid for the Proposed Action.*

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new Proposed Action?

*The Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA was completed in May of 2014 and is still valid and at this time, there has not been any new information or circumstances that have changed.*

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new Proposed Action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

*The direct, indirect and cumulative effects of the Proposed Action have been analyzed both quantitatively and qualitatively in the Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA.*

5. Is the public involvement and interagency review associated with existing NEPA documents adequate for the current Proposed Action?

*Scoping was done under the Grand County Hazard Tree Removal Programmatic EA DOI-BLM-LLCON02000-2012-0031-EA, by sending out post cards to landowners, government agencies, outfitters, and the interested parties and by posting the EA on 5/12/14 on the KFO's on-line National Environmental Policy Act (NEPA) register.*

## INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by, the Kremmling Field Office interdisciplinary team on 9/23/2014. A complete list of resource specialists who participated in this review is available upon request from the Kremmling Field Office. The table below lists resource specialists who provided additional remarks concerning cultural resources and special status species.

Name	Title	Resource	Date
Bill Wyatt	Archaeologist	Paleontological Resources, Cultural Resources, Native American Religious Concerns, and Paleontology	10/20/2014
Darren Long	Wildlife Biologist	Special Status Plant and Wildlife Species, Terrestrial Wildlife, Fisheries	10/01/2014
Hannah Schechter	Outdoor Recreation Planner	Visual Resources	10/9/2014
Neilie Goodwin	Range Specialist	Livestock Grazing	10/22/2014
Tom Adamson	Forester	Forestry and Woodland Products	10/28/14
John Monkouski	Outdoor Recreation Specialist	Recreation, Access and Transportation, Noise, Wilderness	10/28/2014
Kevin Thompson	Fuels Specialist	Fire Management	10/20/14
Paula Belcher	Hydrologist	Soil, Water, Air, and Riparian Resources	10/30/2014
Zach Hughes	NRS	Weeds, Vegetation	11/04/2014

## REMARKS:

*Cultural Resources:* The project surveys (BLM Report #CR-13-37 and CR-14-20) covered the area of potential effect (APE). The Class III inventories located, recorded and evaluated nine new cultural resource sites 5GA4343 to 5GA4351. Of the sites, six are historic (5GA4343, 5GA4344, and 5GA4346-5GA4349) and four are prehistoric (5GA4345 and 5GA4349-5GA4351). The BLM has determined that site 5GA4350, a prehistoric site, has the potential for additional data and is therefore considered to be eligible to the National Register of Historic Places (NRHP) under criteria 36 CFR 60.4 (d). Sites 5GA4343, 5GA4344, 5GA4346 to 5GA4349, and 5GA4351 do not meet the evaluation criteria under 36 CFR 60.4 and are not eligible to the NRHP. Four previously recorded sites 5GA250, 5GA2770, 5GA2771 and 5GA1794 were either relocated or not revisited. Of the previously recorded sites, sites 5GA250, 5GA2770, and 5GA2771 are prehistoric, and only site 5GA2770 is determined to be eligible to the NRHP. One previously recorded site 5GA1794 is a historic ranch that is located outside the APE and was not visited or evaluated to the NRHP. No avoidance is necessary of sites 5GA250, 5GA2771, 5GA4343, to 5GA4349, and 5GA4351 because they are no longer part of BLM management consideration. Site 5GA1794, the historic ranch, lies outside the APE and is therefore avoided.

Site 5GA2770 lies along the Smith Mesa Road (BLM Road #2759) and would be avoided by project actions. Site 5GA4347 and historic cabin, though it is determined to be not eligible,

